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February 10, 1998

David Waddell
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505


In Re: *BellSouth Telecommunications, Inc.'s Entry into
Long Distance (interLATA) Service in Tennessee
Pursuant to Section 271 of the Telecommunications
Act of 1996*

Docket No: 97-00309

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of
AT&T's First Set of Data Requests to BellSouth
Telecommunications, Inc.

Sincerely,


Jim Lamoureux

cc: Parties of record

**BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee**

In Re: BellSouth Telecommunications, Inc.'s)	
Entry into Long Distance (interLATA) Service in)	
Tennessee Pursuant to Section 271 of the)	Docket No. 97-00309
Telecommunications Act of 1996)	

**AT&T'S FIRST SET OF DATA REQUESTS TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T") hereby serves its First Set of Data Requests to BellSouth Communications, Inc. ("BellSouth"), to be answered in writing under oath.

DEFINITIONS

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, including, but not limited to BellSouth Corporation and BellSouth Long Distance, Inc., their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.
2. The terms "you" and "your" refer to BellSouth.
3. "AT&T" means AT&T Communications of the South Central States, Inc., its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.
4. "The Act" means the Telecommunications Act of 1996, Pub.L.104-104, 110 Stat. 56 (1996).
5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is (or was formerly) in the possession, custody or control of BellSouth, including but not limited to correspondence, memoranda, workpapers, summaries, stenographic or handwritten notes,

studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including but not limited to electronic mail files and any other information-carrying media; and copies of such writing or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, memoranda, correspondence, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements, and indices on any media whatsoever, including, without limitation, paper, film, any form of electronic, computerized, digitalized, or magnetic storage, and all other methods for the expression or retention of information.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

8. The terms "referring to" or "relating to" mean consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these data requests and information what would not otherwise be brought within their scope.

10. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

11. "Identify" or "identifying" or "identification," when used in reference to a natural person, means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present or last known telephone number of the person.

12. "Identify" or "identifying" or "identification," when used in reference to a person other than a natural person, means to state:

- a) the full name of the person and any names under which it conducts business;
- b) its present or last known principal place of business;
- c) the present or last known telephone number of the person; and
- d) the name of the chief executive officer of that person.

13. "Identify" or "identifying" or "identification," when used in reference to a document, means to provide with respect to each document requested to be identified by these data requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

14. "Identify," "identifying" or "identity," when used in reference to a communication, means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

15. "Including" means "including, but not limited to."

INSTRUCTIONS

1. If you contend that any response to any data request may be withheld under the attorney-client privilege, the attorney work product doctrine, or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit a determination of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;

- c) the date, title, number of pages, and subject matter of any document that is withheld as privileged (except to the extent that you claim that such information itself is privileged).
 - d) the identity of the author(s) and/or preparer(s) and the addressee(s) (if any) of any document withheld as privileged.
2. If you contend that the response to any data request may be withheld on the grounds that it includes customer account records, or that such response constitutes proprietary confidential business information, please mask any customer-specific information that would enable AT&T to identify particular customers (other than AT&T) and identify with specificity the type of information so masked and the reasons for withholding such information.
3. These data requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These data requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.
4. If any data request cannot be responded to in full, answer to the extent possible and specify the reasons for your inability to respond fully. If you object to any part of a data request, answer all parts of the data request to which you do not object, and as to each part to which you do object, separately set forth the specific basis for the objection.
5. These data requests are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these data requests subsequently become known.
6. The answer to each data request should first restate the question asked and also provide the name of the person or persons supplying the information.
7. Unless otherwise stated, these data requests concern the time period from February 8, 1996 to the present.

DATA REQUESTS

1. Does BellSouth collect and maintain the following data regarding the processing of resale orders:
- (a) the number of resale orders requesting service migration (i.e., switch-as-is or switch-as-specified) received by BellSouth from CLECs;
 - (b) the number of resale orders requesting new service installation received by BellSouth from CLECs;
 - (c) the number of resale orders requesting service changes (for existing CLEC customers) received by BellSouth from CLECs;

- (d) the number of resale orders received by BellSouth from CLECs via LENS;
- (e) the number of resale orders received by BellSouth from CLECs via EDI;
- (f) the number of resale orders received by BellSouth from CLECs via means other than LENS or EDI;
- (g) the number of resale orders sent from LEO (Local Exchange Ordering) to LESOG (Local Exchange Service Order Generator);
- (h) the number of LENS resale orders sent from LEO to LESOG;
- (i) the number of EDI resale orders sent from LEO to LESOG;
- (j) the number of resale orders rejected by LEO;
- (k) the number of LENS resale orders rejected by LEO;
- (l) the number of EDI resale orders rejected by LEO;
- (m) the number of resale orders sent from LEO to the LCSC (Local Carrier Service Center);
- (n) the number of LENS resale orders sent from LEO to the LCSC;
- (o) the number of EDI resale orders sent from LEO to the LCSC;
- (p) the number of resale orders sent from LESOG to SOCS (Service Order Centralization System);
- (q) the number of LENS resale orders sent from LESOG to SOCS;
- (r) the number of EDI resale orders sent from LESOG to SOCS;
- (s) the number of resale orders sent from LESOG to the LCSC;
- (t) the number of LENS resale orders sent from LESOG to the LCSC;
- (u) the number of EDI resale orders sent from LESOG to the LCSC;
- (v) the number of resale orders received by the LCSC from LEO that are rejected;
- (w) the number of LENS resale orders received by the LCSC from LEO that are rejected;
- (x) the number of EDI resale orders received by the LCSC from LEO that are rejected;
- (y) the number of resale orders received by the LCSC from LESOG that are rejected;
- (z) the number of LENS resale orders received by the LCSC from LESOG that are rejected;
- (aa) the number of EDI resale orders received by the LCSC from LESOG that are rejected;
- (ab) the number of resale orders sent from the LCSC to SOCS;
- (ac) the number of LENS resale orders sent from the LCSC to SOCS;
- (ad) the number of EDI resale orders sent from the LCSC to SOCS;
- (ae) the number of resale orders rejected by LESOG;
- (af) the number of LENS resale orders rejected by LESOG;
- (ag) the number of EDI resale orders rejected by LESOG;
- (ah) the number of resale orders rejected by SOCS;
- (ai) the number of LENS resale orders rejected by SOCS;
- (aj) the number of EDI resale orders rejected by SOCS;
- (ak) the number of resale orders sent from SOCS to LCSC;
- (al) the number of LENS resale orders sent from SOCS to LCSC;
- (am) the number of EDI resale orders sent from SOCS to LCSC;
- (an) the number of resale orders received by the LCSC from SOCS that are rejected;

- (ao) the number of LENS resale orders received by the LCSC from SOCS that are rejected;
- (ap) the number of EDI resale orders received by the LCSC from SOCS that are rejected;
- (aq) the number of resale orders processed by SOCS without prior intervention by the LCSC;
- (ar) the number of LENS resale orders processed by SOCS without prior intervention by the LCSC; and
- (as) the number of EDI resale orders processed by SOCS without prior intervention by the LCSC.

2. With respect to resale orders sent from LEO, LESOG, or SOCS to the LCSC, how many orders were subsequently: (a) rejected; (b) entered into SOCS; or (c) not resolved or processed further. If any orders were not resolved or processed further, please explain what action was taken, if any, and why.

3. For each data item in Interrogatory No. 1 that BellSouth answers in the affirmative, please:

- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
- (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
- (c) state period of time covered by the database;

4. Does BellSouth collect and maintain the following data regarding provisioning notices:

- (a) the period of time between the initial receipt of each resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
- (b) the period of time between the initial receipt of each LENS resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
- (c) the period of time between the initial receipt of each EDI resale order and the transmission of the corresponding Firm Order Confirmation to the CLEC;
- (d) the period of time between the initial receipt of a resale order and the transmission of a Completion Notice to the CLEC;
- (e) the period of time between the initial receipt of a LENS resale order and the transmission of a Completion Notice to the CLEC;
- (f) the period of time between the initial receipt of an EDI resale order and the transmission of a Completion Notice to the CLEC;
- (g) the period of time between the initial receipt of a resale order and the transmission of a Rejection Notice to the CLEC;
- (h) the period of time between the initial receipt of a LENS resale order and the transmission of a Rejection Notice to the CLEC;
- (i) the period of time between the initial receipt of an EDI resale order and the transmission of a Rejection Notice to the CLEC;

- (j) the period of time between the transmission of a Jeopardy Notice to CLEC and the due date/appointment at jeopardy;
- (k) the period of time between actual completion and the transmission of a Completion Notice to the CLEC;
- (l) the number of FOCs that were transmitted by LENS and EDI;
- (m) the number of CNs that were transmitted by LENS and EDI;
- (o) the number of rejections that were transmitted by LENS and EDI;
- (p) the number of jeopardies that were transmitted by LENS and EDI;
- (q) the number of FOCs that were transmitted by facsimile or telephone;
- (r) the number of CNs that were transmitted by facsimile or telephone;
- (s) the number of rejections that were transmitted by facsimile or telephone;
- (t) the number of jeopardies that were transmitted by facsimile or telephone.

5. For each data item in Interrogatory No. 4 that BellSouth answers in the affirmative, please:

- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
- (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
- (c) state period of time covered by the database;

6. Does BellSouth collect and maintain the following data regarding due dates:

- (a) the number of requested due dates met for resale orders;
- (b) the number of requested due dates not met for resale orders;
- (c) the number of requested due dates changed by the FOC;
- (d) the number of requested due dates not changed by the FOC;
- (e) the number of confirmed due dates (i.e., confirmed by FOC) met for resale orders
- (f) the number of confirmed due dates not met for resale orders;
- (g) the period of time between the requested due date and the confirmed due date, if different; and
- (h) the period of time between initial receipt of resale order and actual completion.

7. For each data item in Interrogatory No. 6 that BellSouth answers in the affirmative, please:

- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
- (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element; and
- (c) state period of time covered by the database.

8. Does BellSouth collect and maintain the following data regarding resale orders for which BellSouth did meet the requested due date or confirmed due date:

- (a) the period of time between the requested due date and actual completion;
 - (b) the period of time between the confirmed due date and actual completion;
 - (c) whether the order was processed electronically or required human intervention by BellSouth;
9. For each data item in Interrogatory No. 8 that BellSouth answers in the affirmative, please:
- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
 - (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element; and
 - (c) state period of time covered by the database.
10. Does BellSouth collect and maintain the following data regarding UNE orders:
- (a) the number of total orders for: (i) unbundled loops; (ii) unbundled ports;
 - (b) the number of EXACT orders for: (i) unbundled loops; (ii) unbundled ports;
 - (c) the number of EDI orders for: (i) unbundled loops; (ii) unbundled ports;
 - (d) the number of LENS orders for: (i) unbundled loops; (ii) unbundled ports;
 - (e) the number of total orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;
 - (f) the number of EXACT orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;
 - (g) the number of EDI orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;
 - (h) the number of LENS orders for: (i) unbundled loops; (ii) unbundled ports that BellSouth rejected;
 - (i) the period of time between receipt of order for unbundled loops and actual order completion;
 - (j) the period of time between receipt of order for unbundled port and actual order completion;
 - (k) the number of orders for unbundled loops that BellSouth processes electronically without additional human intervention;
 - (l) the number of orders for unbundled ports that BellSouth processes electronically without additional human intervention;
 - (m) the period of time between receipt of UNE order and transmission of FOCs;
 - (n) the period of time between receipt of UNE order and transmission of CNs;
 - (o) the period of time between receipt of UNE order and transmission of rejection;
11. For each data item in Interrogatory No. 10 that BellSouth answers in the affirmative, please:

- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
 - (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
 - (c) state period of time covered by the database;
12. With respect to the API Gateway:
- (a) Describe the business rationale for BellSouth's decision to develop the API Gateway;
 - (b) Describe each purpose for which BellSouth anticipates the API Gateway will be utilized;
 - (c) Describe with specificity all entities that BellSouth anticipates may utilize the API Gateway;
 - (d) Describe the expected time frame for development of the API Gateway, including the date(s) on which the API Gateway is expected to be available to CLECs and any BellSouth affiliate
13. For every function (i.e., preordering, ordering, billing, maintenance and repair) for each interface (e.g., EDI, LENS, TAFI), please provide the following information regarding capacity for all states served by BellSouth:
- (a) State the maximum capacity in terms of CLEC transactions per hour;
 - (i) State the basis for determining this capacity.
 - (ii) Identify any assumptions that were made in calculating capacity, including but not limited to:
 - (A) the percentage of CLEC transactions that are expected to require complete manual processing for each function;
 - (B) the percentage of CLEC transactions that are expected to fall out for some manual processing;
 - (C) the resources to be devoted to each OSS function; and
 - (D) the average time required to perform each OSS function.
 - (b) State the maximum capacity in terms of simultaneous users;
 - (i) State the basis for determining this capacity.
 - (ii) Identify any assumptions that were made in calculating capacity

- (c) With respect to the capacity for LENS pre-ordering (both transactions per hour and simultaneous users);
 - (i) provide the information requested above for the inquiry mode and the firm order mode.
 - (ii) state what constitutes a pre-ordering transaction for the purpose of calculating pre-ordering capacity.
- 14. With respect to the notices of completion sent by BellSouth to the CLECs for Tennessee and the BellSouth region, state:
 - (a) whether the "completion date" set forth on such notices has always been the date on which the service was actually completed, as opposed to other dates (such as the "CPX" date); and
 - (b) if your answer is in the negative, describe what other date has been used as the "completion date" on that notice, and the time period during which that date was so used.
- 15.
 - (a) Identify all OSS interfaces that BellSouth: (i) has made available to CLECs; and (ii) intends to make available to CLECs. If a particular OSS interface is not currently available, please state the date on which BellSouth expects the interface to be available.
 - (b) For each OSS interface identified above, identify each CLEC that: (i) is using that interface; (ii) has requested to use that interface.
- 16.
 - (a) Identify each CLEC that has requested use of CGI to connect electronically to the LENS interface.
 - (b) Identify each CLEC that is currently using CGI to connect electronically to the LENS interface.
 - (c) Identify each CLEC that plans to use the current version of CGI to connect electronically to the LENS interface.
- 17. State the average period of time between receipt of a PIC change request and the completion of the switch in a retail customer's interexchange carrier.
- 18. Describe any performance standards, measurements, and reporting mechanisms that BellSouth uses or will use to monitor its performance in its own local retail operations in the following areas:
 - (a) Ordering
 - (i) Number of orders received;

- (ii) Number of orders processed without human intervention after initial entry into BellSouth's OSS;
 - (iii) Number of orders processed with additional human intervention after initial entry;
 - (iv) Number of orders rejected;
 - (v) Ordering accuracy (i.e., the same services requested by the customer are the same services reflected in the service order)
- (b) Provisioning
 - (i) Period of time between receipt of order and notification equivalent to a FOC or rejection;
 - (ii) Period of time between receipt of order and completion;
 - (iii) Provisioning accuracy (i.e., the same services reflected in the service order are provisioned to the customer);
 - (iv) number of orders where requested due dates are changed;
 - (v) number of orders where BellSouth does not meet requested due date;
 - (vi) number of orders where BellSouth does not meet confirmed due date;
 - (vii) number of orders where BellSouth fails to meet confirmed due date and fails to provide jeopardy notice;
- (c) Maintenance and Repair
 - (i) Number of trouble reports
 - (ii) Number of repeat trouble reports
 - (iii) period of time between receipt of trouble order and restoration of service
 - (iv) Number of service outages over 24 hours.
- (d) Billing
 - (i) Quality
 - (ii) Timeliness
 - (iii) Accuracy

19. For each data item in Interrogatory No. 18 that BellSouth answers in the affirmative, please:

- (a) identify all of the data elements that BellSouth collects and maintains in the database that collects such data item;
- (b) describe with specificity the source of each data element and the rules for determining what value/input is used for each data element
- (c) state period of time covered by the database;

20. Does BellSouth maintain data regarding the number of "backlogged" service orders (i.e., service orders that have been received and are awaiting entry into SOCS)? If yes, please:

- (a) State whether BellSouth maintains such data for CLEC orders, BellSouth's own retail operations, or both;
- (b) Describe how such data is maintained;
- (c) Describe, for the period beginning January 1, 1997:
 - (1) the number of backlogged orders for BellSouth's retail operations;

- (2) the average period of time orders were backlogged for BellSouth's retail operations;
- (3) the number of backlogged orders for all CLECs;
- (4) the number of backlogged resale orders;
- (5) the average period of time resale orders were backlogged;
- (6) the number of backlogged orders for unbundled network elements;
- (7) the average period of time orders for unbundled network element orders were backlogged..

21. Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, that can be ordered using each of the following interfaces:

- (a) EDI;
- (b) EXACT;
- (c) LENS;
- (d) API Gateway.

22. Identify, with specificity, the particular unbundled network elements, and the particular combinations of unbundled network elements, for which maintenance and repair services can be ordered using the following interfaces:

- (a) TAFI;
- (b) EBI.

23. Describe how BellSouth determines the order in which it provides service to its own retail customers. To the extent that BellSouth does not provide service strictly on a first-come, first-served basis, describe:

- (a) the circumstances, class of service, or class of customers that are served on other than a first-come, first-served basis;
- (b) the extent that BellSouth gives some customers or services priority, precedence or preference over others in terms of the installation or repair of service, including the reasons for any such prioritizing, precedence, or preference;
- (c) the extent to which BellSouth has an established system for assigning some customers or services priority, preference or precedence over others in the installation or repair of service, including the assignment of codes to designate such prioritized, preferenced, or preferred customers or services.

24. State whether BellSouth has retained or otherwise requested any outside consultant, or any other independent third party, to study, evaluate, review, or analyze the performance and/or capacity of its operations support systems, including interfaces, the access that BellSouth provides to its OSS for CLECs, and the performance of BellSouth personnel (including the BellSouth Local Carrier Service Center) who process orders submitted by CLECs. If your answer is in the affirmative, identify:

- (a) the name(s) of the outside consultant(s) or other independent evaluators;

- (b) the date on which the consultant(s) was initially contacted by BellSouth concerning each study, evaluation, review, or analysis;
- (c) the nature, scope, and purpose of each study, evaluation, review, or analysis that was conducted;
- (d) the date(s) on which agreement was reached for the consultant(s) to undertake each study, evaluation, review, or analysis;
- (e) the proposed and actual beginning and end dates of each study, evaluation, review, or analysis;
- (f) the results of each study, evaluation, review, or analysis;
- (g) any reports or other documents prepared by the outside consultant(s) or independent evaluator(s), in connection with each study, evaluation, review, or analysis; and
- (h) any concerns, problems, deficiencies, recommendations or areas needing improvement that the consultant(s) identified with respect to BellSouth's OSS, including but not limited to concerns, problems, deficiencies, or areas that need improvement with respect to (1) capacity, (2) parity of access for CLECs, (3) testing, (4) mechanization of interfaces, (5) manual intervention, (6) human error, (7) performance measurement, (8) speed, (9) quality, and (10) ease of use.

25. Describe in detail the BellSouth service intervals that BellSouth believes establishes or will establish that the interval for loop cut-over for CLECs are nondiscriminatory, including, but not limited to, how that interval is or shall be measured.

26. Describe the average interval in which BellSouth initiates new local service for a retail customer, including but not limited to the various permutations of loop cut-overs performed in the central office including "win-back" customers.

27. Describe in detail the manner in which BellSouth intends to provision unbundled network elements ("UNEs") in Tennessee in a manner that allows competing carriers to use combinations of UNEs to provide finished telecommunications services in Tennessee, as required by § 251(c)(3) of the Act. Identify where in BellSouth's SGAT this information is provided.

28. Identify all combinations of UNEs for which BellSouth intends to physically separate the individual network elements before provisioning them to CLECs who desire to use such combinations to provide service in Tennessee, and describe in detail, for each such combination, BellSouth's proposed methods and procedures for separating the elements and for allowing CLECs to use the combination of the elements in order to provide telecommunications services as required by § 251(c)(3) of the Act. Identify where in BellSouth's SGAT this information is provided.

29. Do the costs for the loop and the port in BellSouth's Tennessee cost studies include any costs to reflect the manner in which CLECs may use a loop/port combination to provide service in Tennessee? If so, describe in detail the manner in which such costs are included in

BellSouth's Tennessee cost studies.

30. Does BellSouth agree that it would cost less for BellSouth to allow CLECs to purchase loops and ports as they are already combined in BellSouth's network than it would to require CLECs to purchase loops and ports separated from each other?

31. In order to purchase a loop and port for the purpose of providing service in Tennessee, will it be necessary for a CLEC to have its own physical space in order to combine the loop and the port in order to be able to provide service? If so, where is this requirement set forth in BellSouth's SGAT?

32. If the answer to the previous question is "yes," does BellSouth agree that in order to provide service using a combination of UNEs, it will be necessary to purchase either physical or virtual collocation from BellSouth? If not, describe in detail how a CLEC may combine a loop and a port in own physical space without purchasing either physical or virtual collocation from BellSouth.

33. For each combination of UNEs for which BellSouth will physically separate network elements from one another before provisioning them to CLECs who wish to use combinations of UNEs to provide telecommunications services, describe in detail BellSouth's proposal for maintenance of the combined UNEs. Identify where in BellSouth's SGAT this information is provided.

34. What components of BellSouth's network in Tennessee are currently combined through electronic connections made from remote locations?

35. Can BellSouth make a software change from a remote location to dedicate the traffic of a specific end user customer to reserve capacity on a specific trunk?

36. Do BellSouth's ESSX, MultiServ (or equivalent service) end user customers in Tennessee have the capacity to activate and deactivate lines from remote locations?

37. Can BellSouth make a software change from a remote location that disconnects service on a loop for one customer, and then reestablishes service on the same loop for a second customer? If the answer is in the affirmative, describe the circumstances and manner in which BellSouth can make such a change.

38. Under what circumstances, if any, will BellSouth permit CLEC technicians or a BellSouth approved vendor acting on a CLEC's behalf to have direct access to the BellSouth MDF?

39. Under BellSouth's proposal to allow CLECs to combine the loop and switch through collocation, what work will be performed by (1) BellSouth technicians; (2) CLEC technicians; (3) third-party vendors? Identify where in BellSouth's SGAT this information is provided.

40. Where CLECs request collocated space solely for the purpose of loop/switch combination, will BellSouth require use of a POT frame? If so, for what purpose(s)? If so, will BellSouth require a cross-connection at the POT frame? Identify where in BellSouth's SGAT this information is provided.
41. Describe in detail any BellSouth proposals to maintain service continuity and minimize service disruption during cutover of customer service to a CLEC that provides service via loop and switch combinations. Identify and describe any supplementary charges that BellSouth proposes for minimizing service disruption. Under what circumstances will these supplementary changes be imposed.
42. Assuming a CLEC has pre-wired loop and switch connections in its collocation space to blocks on the MDF or IDF, what is the average expected duration of service outage for conversion of an existing BellSouth customer to a CLEC who provides service through a combination of UNEs? Describe in detail all assumptions underlying this estimate.
43. Describe any testing or studies that BellSouth has undertaken or commissioned to determine the average expected duration of service outages for conversion of an existing BellSouth customer to a CLEC who provides service through a combination of UNEs. Describe the results of any such testing or studies.
44. Where the additional loop length caused by collocation requires loop conditioning, who will be responsible for the conditioning? When and how will such conditioning be done? Identify where in BellSouth's SGAT this information is provided.
45. Describe the methods and procedures BellSouth proposes to ensure adequate updating of engineering records affected by increased loop lengths required to allow CLECs to use combinations of the loop and switch in collocated space, including but not limited to (a) BellSouth's proposal to ensure engineering records are updated to reflect new loop lengths; (b) the engineering records BellSouth will access or modify to separate already combined elements, and to allow CLECs to complete combination of UNEs; and (c) whether BellSouth will provide CLECs access to the engineering records that are accessed or modified in connection with the separation and combination of UNEs.
46. When trouble is reported on the line of a customer of a CLEC who provides service through a combination of UNEs, what methods or procedures does BellSouth propose for responding? Identify all manuals, handbooks, operating procedures, or other documents which contain such methods and procedures.
47. What is the maximum number of loop/switch combination orders that BellSouth will be able to provision in a single central office per day? Explain in detail all of the assumptions underlying this estimate, including but not limited to the size of the central office, the number of technicians needed to complete one order, the number of technicians working simultaneously on

the MDF, the number and length of working shifts per day, and the number of central offices at which provisioning could occur on the same day at such a level.

48. Describe any testing or studies that BellSouth has undertaken or commissioned to determine the maximum number of loop/switch combination orders that BellSouth could provision in a single central office per day. Describe the results of any such testing or studies.

49. What is the greatest number of loop/switch combinations that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in which BellSouth provides service ?

50. What is the greatest number of unbundled loops that BellSouth has provisioned in a central office in one day, both in Tennessee, and in any other state in the BellSouth region?

51. What is the average number of cross-connections on an MDF that BellSouth currently completes in a central office per day? Describe in detail the basis for this response.

52. Will BellSouth require AT&T and other CLECs to execute a "Master Collocation Agreement" or other agreement(s) before BellSouth will make collocation available to AT&T and other CLECs?

53. Does BellSouth contend that modifications are needed to AT&T's interconnection agreements, in Tennessee, and throughout the BellSouth region, before BellSouth will make collocation available to AT&T? Describe any such modifications.

54. Where there is inadequate space in a central office to accommodate a CLEC's physical collocation request, by what method will BellSouth allow CLECs to combine loops and switches?

55. Will BellSouth permit CLECs requesting collocation space solely for purposes of combining UNEs to obtain less than 100 square feet of space? If yes, how will BellSouth adjust its existing proposed charges for collocated space?

56. Will BellSouth offer CLECs seeking to combine UNEs a choice of either physical or virtual collocation? If so, what will be the price differential? If not, under what circumstances will virtual collocation be available?

57. How many central offices, including remote switching locations, does BellSouth have (a) in Tennessee; and (b) throughout the BellSouth region? List the number of remote switching locations.

58. List each central office, in Tennessee and throughout the region served by BellSouth, where BellSouth anticipates it will be unable to accommodate requests for physical collocation.

59. How many physical and virtual collocation arrangements can BellSouth complete per month, in Tennessee, and on a region-wide basis? Explain in detail all of the assumptions underlying this estimate, including any limitations on number of collocation applications BellSouth can accommodate per month in a given geographic region.
60. Describe any intervals to which BellSouth has committed for the provision of collocated space, and to which CLECs the commitments have been made. Describe what remedies are available to CLECs if the committed intervals are not met.
61. Describe any testing or studies that BellSouth has undertaken or commissioned to determine whether it can meet its committed intervals for provision of collocated space. Describe in detail the results of any such testing or studies.
62. How many requests for physical collocation has BellSouth received in Tennessee and in the region served by BellSouth?
63. How many physically collocated spaces has BellSouth completed, in Tennessee and in the region served by BellSouth?
64. How many requests for virtual collocation has BellSouth received in Tennessee and in the region served by BellSouth?
65. How many virtually collocated spaces has BellSouth completed, in Tennessee and in the BellSouth region as a whole?
66. Will BellSouth allow a CLEC to collocate in a remote switching site that houses a BellSouth remote switching module?
67. List all remote switching sites in Tennessee and in the region served by BellSouth that cannot currently accommodate more than one physical collocation space.
68. Describe the method by which BellSouth will provide individual loops for combination with switches for CLECs who wish to use combinations of loops and switches to provide service, where the individual loops are currently provisioned by BellSouth using integrated digital loop carrier ("IDLC"). State whether this method is available for all customers currently served by BellSouth.
69. To the extent that BellSouth proposes to switch over BellSouth's IDLC customers to CLECs who provide service through a combination of UNEs by reconnecting the customer's loop to an analog line:
- (a) state whether spare analog facilities will be available for every IDLC customer;
 - (b) state whether the customer's service quality will be degraded by the conversion to an analog line;

- (c) provide an estimate of the cost of converting the loop to an analog line;
- (d) provide an estimate of the average customer service outage incurred during the conversion to an analog line;
- (e) Describe in detail the basis for your responses to (a) - (d).

70. What percentage of BellSouth loops are currently provisioned using IDLC, in Tennessee, and throughout the region served by BellSouth? What percentage of BellSouth's customers in Tennessee does BellSouth anticipate serving by IDLC by the year 2000? By the year 2003?

71. Has BellSouth investigated any alternatives to collocation for providing UNEs to CLECs who wish to use combinations of UNEs to provide service in Tennessee? If so, please describe these alternatives and explain BellSouth's reasons for not making these alternatives available to CLECs prior to this date. If not, when will any such investigation be done?

72. Will BellSouth permit CLECs to purchase UNEs as they are already combined in BellSouth's network, at individual UNE rates plus an additional "glue charge?" If so, define the "glue charge" and describe how that charge will be calculated. If not, state the basis on which BellSouth refuses to provide UNEs as they are already combined in BellSouth's network.

73. Will BellSouth permit CLECs to recombine the loop and switch through "direct separation and recombination," i.e., by directly disconnecting and reconnecting (through ILEC and CLEC technicians or a third party vendor) the cross-connect at the MDF at UNE rates? If not, state: (a) the basis for refusing to allow such recombination; (b) the manner in which BellSouth will provide the separated loop and switch combination; and (c) what rewiring, if any, BellSouth will permit at the MDF, the Intermediate Distribution Frame ("IDF") and/or in the CLEC's collocated space.

74. Will BellSouth permit CLECs to recombine the loop and switch through the use of permanently-installed pre-wired CLEC connector blocks on the MDF at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks; and (b) the manner in which BellSouth will provide cross-connection to the MDF.

75. Will BellSouth permit CLECs to recombine the loop and switch through the use of an electronic cross-connect system at UNE rates? If not, state: (a) the basis for refusing to allow recombination using permanently installed prewired connector blocks; and (b) the manner in which BellSouth will provide cross-connection to the MDF.

76. Will BellSouth permit CLECs to recombine the loop and switch through use of the "recent change" process at UNE rates? If not, state the basis for refusing to allow recombination using the "recent change process."

77. State the number of CLEC orders for local switching received by BellSouth in Tennessee, the number of such orders processed by BellSouth in Tennessee, and the names of those CLECs placing orders in Tennessee.

78. Does the rate currently charged by BellSouth for unbundled local switching encompass all features and functions associated with local switching? If so, please describe those features and functions. Please also list any features and functions that are priced separately than the rate for unbundled local switching.

79. Describe the process by which BellSouth intends to record and bill access usage for the transport and termination of (a) an interLATA toll call; and (b) an intraLATA toll call for CLECs who use combinations of UNEs to provide local service. Is BellSouth's response the same for CLECs who provide local service by using their own switch? If not, please describe BellSouth's proposal with respect to access for such CLECs. Identify where in BellSouth's SGAT such information is contained.

80. For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for origination of interLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

81. For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for origination of intraLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

82. For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for termination of interLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

83. For CLECs who provide local service by using UNEs, will BellSouth continue to charge such CLECs access for termination of intraLATA toll calls? Is BellSouth's response the same for CLECs who provide local service by using their own switch? Identify where in BellSouth's SGAT such information is contained.

84. With respect to Automatic Message Account (AMA) recording, please:

- (a) identify the central offices that are equipped for 100 percent AMA recording
- (b) state the schedule for equipping the remaining central offices for 100 percent AMA recording;
- (c) state whether BellSouth can forward 100 percent AMA recording to CLECs and if not, the reasons why BellSouth cannot forward such recordings;
- (d) if BellSouth cannot forward 100 percent AMA recordings to CLECs, explain the reasons underlying BellSouth's inability and its plan for achieving that capability.

85. With respect to OLEC Daily Usage File (ODUF), please:

- (a) state when the ODUF will contain terminating local usage from other CLECs and ICOs for use by CLECs using unbundled ports from BellSouth;
- (b) state when the ODUF will contain rated messages for calls to all Information Service Providers with whom BellSouth has a contractual arrangement to provide service and collect revenue;
- (c) state when BellSouth will provide CLECs with a return feed by which CLECs can return erroneous data;
- (d) state when BellSouth will forward 100 percent AMA recorded messages to CLECs.

86. With respect to Access Daily Usage File (ADUF), please:

- (a) state when the ADUF will be operationally ready in light of unsuccessful ADUF testing with AT&T in Kentucky;
- (b) state how many CLECs are currently receiving ADUF and how many ADUFs has BellSouth provided;
- (c) state when BellSouth will be capable of providing intra-state originating and terminating access records in the ADUF along with inter-state data;

87. Please state whether BellSouth is providing CMDS files to CLECs. If the answer is affirmative, please state the number of CLECs to which BellSouth is providing CMDS files and the number of CMDS files that BellSouth has provided.

88. Please state whether BellSouth is planning to replace its existing service ordering systems for business customers (i.e., DOE and SONGS). If the answer is affirmative, please:

- (a) state when is BellSouth planning to replace DOE, SONGS, or both;
- (b) describe the technology that BellSouth will use in its replacement systems;
- (c) describe the functional improvements over DOE and SONGS that BellSouth expects to achieve through its replacement system;
- (d) state whether BellSouth will provide equivalent improvements to OSS interfaces used by CLECs and describe how BellSouth will improve each particular interface.

DOCUMENT REQUESTS

1. Please provide the database described in Data Request Nos. 1 and 3 for the period from July 1, 1997, to the present.
2. Please provide the database described in Data Request Nos. 4 and 5 for the period from July 1, 1997, to the present.
3. Please provide the database described in Data Request Nos. 6 and 7 for the period from July 1, 1997, to the present.
4. Please provide the database described in Data Request Nos. 8 and 9 for the period from July 1, 1997, to the present.
5. Please provide the database described in Data Request Nos. 10 and 11 for the period from July 1, 1997, to the present.
6. Please provide the database described in Data request Nos. 18 and 19 for the period from July 1, 1997, to the present.
7. In connection with Data Request No. 24, produce copies of any analyses, reports, studies, evaluations, or other documents prepared in connection with any review of BellSouth's OSS (including, but not limited to, any OSS features, functions, components, and interfaces) by any outside consultant or consultants. Such documents include, but are not limited to:
 - (a) all documents which contain or set forth the scope of the consultant(s)' review(s);
 - (b) all correspondence and any agreements constituting, evidencing or reflecting the consultant(s)' retention and the terms of that retention by BellSouth;
 - (c) all documents constituting, evidencing, or reflecting the consultant(s)' work plans for the review(s), regardless of whether those plans were actually carried out;
 - (d) all documents, information, and materials (whether paper, electronic, or any other form) that the consultant(s) have reviewed, considered, or relied upon in connection with each review of BellSouth's OSS;
 - (e) all work product (whether written, electronic, or any other form) prepared by the consultant(s) in connection with the review(s) of BellSouth's OSS, including any and all analyses, memoranda, notes, interview notes, indices, summaries, logs and all other types of work product, and including, but not limited to, drafts, work papers or any preliminary reports in any form;
 - (f) all documents that relate to any problems, deficiencies, recommendations, or areas that were identified by the consultant(s) in BellSouth's OSS, including but not limited to documents that reflect (1) the views of the consultant(s), and (2) any responses or actions taken in response by BellSouth.

8. Produce copies of all documents that report on the performance of BellSouth's LCSC operations, including but not limited to "LCSC Weekly Operations Reports."
9. Produce copies of all reports that reflect BellSouth's performance in installing and maintaining interconnection arrangements for unbundled elements and resold services since January 1, 1997.
10. Produce copies of any documents, analyses, or logs prepared or maintained by BellSouth since January 1, 1997 in connection with CLEC orders (testing or customer) that have remained pending, "in process" or "in error" beyond the requested or committed due date, both in Tennessee and region-wide.
11. Produce copies of all documents related to IBM's review of BellSouth's OSS stress testing.
12. Produce copies of all documents that describe any problems with the interfaces offered to CLECs by BellSouth, any defects in those interfaces, malfunctions of those interfaces, or complaints by CLECs concerning BellSouth's interfaces, including but not limited to any problem logs.
13. Produce copies of any reports, studies, or analyses, or any other reports comparing BellSouth's performance for its retail operations with its performance for the CLECs, since January 1, 1997.
14. Produce copies of all documents that describe any priority, preference, or precedence that, in the installation or repair of service, BellSouth gives to:
 - (a) particular customers;
 - (b) a particular class or classes of customers;
 - (c) particular products or services;
 - (d) a particular class or classes of products or services.
15. Produce copies of all training materials, including any course syllabus or course outline, related to use of RNS and SONGS by BellSouth personnel or third parties.
16. Produce copies of all documents that discuss, relate, or refer to the API Gateway, including but not limited to documents that (i) discuss the API Gateway's purpose and scope; (ii) the business rationale for development of the API Gateway; (iii) anticipated use and users of the API Gateway; and (iv) the time frame for development and completion of the API Gateway.
17. Produce copies of all versions of BellSouth's "Electronic Interface Sales Pipeline."
18. Produce the data dictionary, or its equivalent, that documents the contents of BellSouth's data warehouse referred to in Mr. Stacey's testimony and affidavits, along with all documentation identifying or describing the meaning of all data elements in the data warehouse. The

information requested includes but is not limited to documents identifying or describing the following:

- 1 field name
- 2 field length
- 3 business meaning of the content of the field
- 4 table or tables where the field is stored
- 5 identification of whether the field is a primary or foreign key
- 6 permissible values for the field and the meaning if not self-evident.

19. Produce all pictures or visual representations of the data base schema pertaining to the data warehouse, which identifies the following information:

1. table relationships
2. use of fields as primary and foreign key
3. types of relationships between data base tables (i.e., one-to-many, one-to-one, many-to-one)
4. indexing (listing of indexed fields as well if they are unique indexes).

20. Produce all reports, whether production or test reports, reflecting BellSouth's performance in support of pre-ordering, ordering, provisioning, repair and maintenance, and billing for AT&T's operations as a CLEC in BellSouth's territory, generated by BellSouth since November of 1997. Also produce any explanatory information necessary to understand the meaning of the reports.

21. Produce copies of all documents that describe, with specificity, what particular unbundled network elements, and what particular combinations of unbundled network elements, can be ordered by CLECs through each of BellSouth's interfaces.

22. Produce copies of all documents that describe any priority, preference, or precedence that, in the installation or repair of service, BellSouth gives to:

- (a) particular customers;
- (b) a particular class or classes of customers;
- (c) particular products or services;
- (d) a particular class or classes of products or services.

23. Produce copies of any analyses, reports, studies, evaluations, or other documents prepared in connection with any review of BellSouth's OSS (including, but not limited to, any OSS features, functions, components, and interfaces) by any outside consultant or consultants. Such documents include, but are not limited to:

- (a) all documents which contain or set forth the scope of the consultant(s)' review(s);
- (b) all correspondence and any agreements constituting, evidencing or reflecting the consultant(s)' retention and the terms of that retention by BellSouth;

- (c) all documents constituting, evidencing, or reflecting the consultant(s)' work plans for the review(s), regardless of whether those plans were actually carried out;
- (d) all documents, information, and materials (whether paper, electronic, or any other form) that the consultant(s) have reviewed, considered, or relied upon in connection with each review of BellSouth's OSS;
- (e) all work product (whether written, electronic, or any other form) prepared by the consultant(s) in connection with the review(s) of BellSouth's OSS, including any and all analyses, memoranda, notes, interview notes, indices, summaries, logs and all other types of work product, and including, but not limited to, drafts or any preliminary reports in any form;
- (f) all documents that relate to any problems, deficiencies, recommendations, or areas that were identified by the consultant(s) in BellSouth's OSS, including but not limited to documents that reflect (1) the views of the consultant(s), and (2) any responses or actions taken in response by BellSouth.

24. Produce copies of any documents that discuss, relate to, or refer to the response times for pre-ordering transactions (whether for CLECs using the LENS interface or for BellSouth's own retail operations), including but not limited to (1) documents that contain any programmatically-generated response time data comparing access from LENS to BellSouth's legacy systems with access from RNS, DOE, or SONGS to BellSouth's legacy systems, and (2) studies and analyses (whether or not completed) of response times.

25. Produce copies of all documents that discuss, or from which one can determine, the average time that BellSouth takes to send a notice of rejection to a CLEC when an order is rejected by BellSouth's systems.

26. Produce copies of all training materials, including any course syllabus or course outline, related to use of RNS and SONGS by BellSouth personnel or third parties.

27. Produce copies of all written methods and procedures concerning BellSouth's proposal for combining UNEs through collocation.

28. Produce copies of all documents that describe, discuss, or relate to alternatives to collocation for the combination of UNEs.

29. Produce copies of all documents that discuss any testing, studies, or actual commercial usage data relating to BellSouth's ability to provision collocated space or BellSouth's proposal to recombine UNEs through collocated space. (Such documents include, but are not limited to, test or study agreements, test or study plans, interim or final test or study results, and any documents summarizing or analyzing test or study results or actual commercial usage data).

30. If BellSouth will require AT&T or other CLECs to execute a "Master Collocation Agreement" before making collocated space available, please produce a copy of the most current version of this agreement.

31. Produce copies of all documents that describe or discuss any complaints by CLECs concerning BellSouth's provision of collocated space.

32. Produce copies of all documents that describe or discuss any complaints by CLECs concerning loss of service during cut-over of a customer from BellSouth to CLEC service.

33. Produce the data dictionary, or its equivalent, that documents the contents of BellSouth's data warehouse referred to in Mr. Stacey's testimony and affidavits, along with all documentation identifying or describing the meaning of all data elements in the data warehouse. The information requested includes but is not limited to documents identifying or describing the following:

- 1 field name
- 2 field length
- 3 business meaning of the content of the field
- 4 table or tables where the field is stored
- 5 identification of whether the field is a primary or foreign key
- 6 permissible values for the field and the meaning if not self-evident.

34. Produce all pictures or visual representations of the data base schema pertaining to the data warehouse, which identifies the following information:

1. table relationships
2. use of fields as primary and foreign key
3. types of relationships between data base tables (i.e., one-to-many, one-to-one, many-to-one)
4. indexing (listing of indexed fields as well if they are unique indexes).

35. Produce all reports, whether production or test reports, reflecting BellSouth's performance in support of pre-ordering, ordering, provisioning, repair and maintenance, and billing for AT&T's operations as a CLEC in BellSouth's territory, generated by BellSouth since November of 1997. Also produce any explanatory information necessary to understand the meaning of the reports.

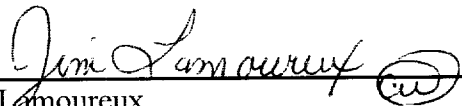
36. Produce all manuals, procedures or other instructions that describe the processes and/or schedule for interconnecting a loop and a switch combination that has been separated by BellSouth and recombined by the CLEC.

37. Produce all documents identified or relied upon in responding to AT&T's Data Requests above.

38. Produce all work papers and other documents provided to, created by, or used by, Ernst & Young, LLP in preparing any and all analyses of BellSouth's OSS.

39. Produce copies of all BellSouth responses to data requests and document requests served on BellSouth in Docket No. 97-00309 by parties other than AT&T.

Respectfully submitted, this 10th day of February, 1998.



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CERTIFICATE OF SERVICE

I, James P. Lamoureux, hereby certify that on this 10th day of February, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:


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